

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

FILED

AUG 12 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

In the Matter of the Search of

A SILVER 2005 CHEVROLET SILVERADO PICK-UP TRUCK
BEARING TEXAS LICENSE PLATE FWS3821 AND VEHICLE
IDENTIFICATION NUMBER 2GCEC19V851315531, CURRENTLY
IMPOUNDED AT STE. GENEVIEVE COUNTY SHERIFF'S
DEPARTMENT IN STE. GENEVIEVE, MISSOURI (AS FURTHER
DESCRIBED IN ATTACHEMENT A).

Case No. 1:15MJ4163ACL

APPLICATION FOR A SEARCH WARRANT

I, Eric Brandon Ruhe, a federal law enforcement officer or an attorney for the government
request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

A SILVER 2005 CHEVROLET SILVERADO PICK-UP TRUCK BEARING TEXAS LICENSE PLATE FWS3821 AND VEHICLE IDENTIFICATION NUMBER
2GCEC19V851315531, CURRENTLY IMPOUNDED AT STE. GENEVIEVE COUNTY SHERIFF'S DEPARTMENT IN STE. GENEVIEVE, MISSOURI (AS
FURTHER DESCRIBED IN ATTACHEMENT A)

located in the EASTERN District of MISSOURI, there is now concealed

SEE ATTACHMENTS A AND B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18:1594(c)
 18:2422
 18:2423(a)


Offense Description

Conspiracy to Commit Sex Trafficking of a Child and by Force, Fraud, and Coercion
 Coercion and Enticement
 Transportation of Minors

The application is based on these facts:

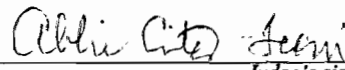
SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


 Eric Brandon Ruhe, Special Agent
 Federal Bureau of Investigation
 Printed name and title

Sworn to, attested to, and affirmed before me via reliable
 electronic means pursuant to Fed.R.Crim.P. 4.1 & 41.

Date: August 12, 2015


 Judge's signature

City and state: Cape Girardeau, MO

Honorable Abbie Crites-Loeni, U.S. Magistrate Judge
 Printed name and title

AUSA: LARRY FERRELL

IN THE MATTER OF THE SEARCH OF:

A SILVER 2005 CHEVROLET SILVERADO
PICK-UP TRUCK BEARING TEXAS
LICENSE PLATE FWS3821 AND
VEHICLE IDENTIFICATION
NUMBER 2GCEC19V851315531,
CURRENTLY IMPOUNDED AT
STE. GENEVIEVE COUNTY SHERIFF'S
DEPARTMENT IN STE. GENEVIEVE,
MISSOURI (AS FURTHER DESCRIBED
IN ATTACHEMENT A).

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR SEARCH WARRANT**

I, Eric Brandon Ruhe, being duly sworn depose and say:

I am a Special Agent with the Federal Bureau of Investigation, and have reason to believe that in the vehicle described as:

A SILVER 2000 CHEVROLET SILVERADO PICK-UP TRUCK BEARING TEXAS
LICENSE PLATE FWS3821 AND VEHICLE IDENTIFICATION NUMBER
2GCEC19V851315531, CURRENTLY IMPOUNDED AT ST. GENEVIEVE COUNTY
SHERIFF'S DEPARTMENT IN STE. GENEVIEVE, MISSOURI (As further described in
Attachment A)(hereinafter the "SUBJECT VEHICLE")

currently located in the Eastern District of Missouri there is now concealed a certain person or property, namely:

SEE ATTACHED LIST, ENTITLED "ATTACHMENT B"

which constitutes evidence of the commission of a criminal offense or which is contraband, the fruits of a crime, or things otherwise criminally possessed, or which is designed or intended for use which is or has been used as the means of committing and offense in violation of Title 18, United States Code, Section 1594(c) (Conspiracy to Commit Sex Trafficking of a Child and by Force, Fraud, and Coercion), Title 18, United States Code, Section 2422 (Coercion and Enticement of a Person to Participate in Prostitution Activity), and Title 18, United States Code, Section 2423(a) (Transportation of Minors to Engage in Criminal Sexual Activity).

AFFIDAVIT

Your affiant, Eric Brandon Ruhe, after being duly sworn, does hereby state that he is a Special Agent with the Federal Bureau of Investigation (FBI) currently assigned to the Fairview Heights Resident Agency. I have been a Special Agent with the FBI since December 2009.

From 2001 until 2009, I was a police officer employed first by the Carterville, Illinois Police Department and subsequently by the Carbondale, Illinois Police Department. I was also an FBI Task Force Officer from approximately May 2008 until June 2009, where I was assigned to investigate matters involving the online exploitation of children, particularly regarding the possession, receipt, and transmission of images of child pornography. Furthermore, pursuant to my duties with the Springfield FBI Child Exploitation Task Force (SICETF), I have conducted and assisted in several investigations related to the trafficking of children for the purposes of sex or prostitution. Moreover, I have consulted with other Special Agents and FBI personnel who have had experience with such investigations. In addition, I have gained expertise in the conducting of such investigations as well as investigations involving the human trafficking of minor victims, through training seminars, classes, and everyday work related these types of investigations. I am familiar with and have utilized normal methods of investigation, including but not limited to physical and electronic surveillance, questioning of witnesses, the use of search and arrest warrants, the use of informants, the use of pen registers, analysis of telephone records, the utilization of undercover agents, and the use of court-authorized wire intercepts.

The statements contained in this affidavit are based on the investigation of your affiant, my personal observations, and my training and experience as well as information derived from reports and interviews of other law enforcement officers and witnesses named herein. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of the affiant's knowledge about this matter.

INVESTIGATION

Since July 2015, the Fairview Heights office of the Federal Bureau of Investigation (FBI) has been investigating Marcus Thompson and Robin Thompson (nee Robin Lott) (hereinafter THE THOMPSONS) in connection with violations of Title 18, United States Code, Section 1594(c) (Conspiracy to Commit Sex Trafficking of a Child and by Force, Fraud, and Coercion), Title 18, United States Code, Section 2422 (Coercion and Enticement), and Title 18, United States Code, Section 2423(a) (Transportation of Minors) in the Southern District of Illinois and elsewhere in the United States. Reports made by a minor victim, hereafter M.J., informed agents and FBI personnel that THE THOMPSONS used force, fraud and coercion to recruit her and other females, both minors and adults, to engage in prostitution in multiple states.

More specifically, on July 25, 2015, the National Human Trafficking Response Center (NHTRC) contacted the Chicago Division of the FBI to report a child, M.J., fifteen years of age was located at Cardinal Glennon Children's Hospital in St. Louis, MO. Furthermore, the NHTRC report identified Marcus and Robin Thompson as the individuals who had recruited M.J. and transported her from Illinois to locations in "Orlando, FL, St. Louis, MO, New Mexico and Texas." The report indicated a total of five female sex trafficking victims. The report also indicated that M.J. had reportedly been the subject of violence by THE THOMPSONS and that the couple had possessed firearms while she was in their presence. Furthermore, the report stated that M.J. felt she would be physically harmed if she attempted to separate herself from THE THOMPSONS.

Following, Intelligence Analyst (IA) Derek G. Velazco, Sgt. Mike Slaughter from the St. Louis City Metropolitan Police Department, and I responded to Cardinal Glennon Children's Hospital on July 27, 2015. Subsequent interviews were conducted with M.J. on July 31, 2015, and August 4, 2015. During these interviews, M.J. stated that she was 15 years old and that her year of birth was 2000. This information was corroborated by her father. M.J. stated on about June 9, 2015, she had been picked up by Marcus Thompson in a white four-door pickup truck while walking in Madison, Illinois. It was later determined that on or about June 10, 2015, the aforementioned truck was returned to Enterprise Rentals by Marcus Thompson. After returning the white pickup truck, THE THOMPSONS drove M.J. around in a brown four door pickup truck that M.J. thought belonged to Marcus Thompson. M.J. stated she had been told by Marcus Thompson she could earn money as a model and for this reason she agreed to get into the white pickup truck with Marcus Thompson. M.J. stated there were four other girls in the extended cab portion of the truck already, one Hispanic female, one black female, one white female, and another female of unknown ethnicity. M.J. believed the girls ages were 15 years old, 12 years old, 18 years old, and one of unknown age. M.J. stated that while in the truck, she told Marcus Thompson she was 15 years old, and he said that was fine.

M.J. stated she was with THE THOMPSONS when they stole a camper trailer (hereinafter "the camper") from a camper retailer somewhere in Missouri on or about June 9, 2015. M.J. heard Marcus Thompson say that they were going to steal a camper so they would have somewhere to stay. After stealing the camper, THE THOMPSONS drove the girls about 9 to 10 hours before stopping at a hotel. The next day, they arrived in Orlando, Florida. They parked the camper in a campsite. M.J. stated Marcus Thompson took pictures of her in the camper on the bed for prostitution advertisements on www.backpage.com. M.J. was forced to hide her face in the pictures by leaning her head as far back as she could. M.J. said that the second day was when THE THOMPSONS began making her have sex with men for money. Some of the men that paid to have sex with her would pay more to be able to take pictures and videos of her with their phones. M.J. stated she remembered one of the girls with her was Cassie (LNU), a white female, fifteen years old. Furthermore, M.J. said that Cassie later died in her arms after being injected with heroin and being made to have sex with multiple men. The group spent a total of five days in Orlando.

While in Orlando, Florida, M.J. met men that responded to the Backpage ads for sex dates at an area hotel and once in the aforementioned camper. M.J. also stated that THE THOMPSONS would pick up females from the "OBT" (fully identified as the Orange Blossom Trail, a location known to cater to local prostitution) in Orlando, in order to involve them in their prostitution scheme. Lastly, M.J. reported that while participating in sex acts she brought in about \$1,000.00 a day by prostitution.

After leaving Orlando, the group traveled to Nashville, TN where they continued to advertise for commercial sex dates there, but it was "not busy" so they left after two days. The group then traveled from Nashville, TN, to Pensacola, FL and then they traveled to the Dallas/Fort Worth area of TX. Also, throughout their travels, THE THOMPSONS forced M.J. to participate in a commercial sex dates with truck drivers at multiple truck stop locations, including but not limited to Flying J locations in Florida and Texas. Additionally, M.J. reported that THE

THOMPSONS were violent toward her and the other girls and they had multiple guns. Even further, other men would "watch" the girls when THE THOMPSONS were not around. Also, at one point when M.J. refused to participate in anal sex with a man, Marcus Thompson physically assaulted her. Following, M.J. attempted to escape into the woods from the camper one time, but was caught and later assaulted by Marcus Thompson as punishment for the attempted escape. M.J. also stated that she and the other girls were threatened that if they tried to escape, they would be killed and thrown to the alligators in the swamp.

Following the first interview of M.J., administrative subpoenas were sent to Backpage.com and the records returned did in fact depict prostitution advertisements for M.J. which were posted in Orlando and Pensacola, FL, Atlanta, GA, Nashville, TN, and Dallas, TX. None of the photographs show M.J.'s face, but M.J. verified that the pictures in the aforementioned ads were of her taken by Marcus Thompson.

Subsequently, during this investigation, on August 9, 2015, an officer with the Ste. Genevieve Police Department in Missouri observed Robin Thompson driving a blue Chevrolet Cavalier with no visible license plates. The Cavalier was being followed closely by Marcus Thompson, who drove the **SUBJECT VEHICLE**. The officer activated his emergency lights and siren and directed Marcus Thompson to yield, but he refused to do so. Robin Thompson then pulled into a parking lot, followed by Marcus Thompson. The officer approached the two vehicles, but then Marcus Thompson sped off from the lot in the **SUBJECT VEHICLE**. The officer sought assistance in following Marcus Thompson and then a trooper with the Missouri State Highway Patrol (MSHP) pursued Marcus Thompson. Subsequently, Marcus Thompson was able to escape on foot and abandoned the **SUBJECT VEHICLE** behind a shopping center.

On August 10, 2015, United States Magistrate Judge Stephen C. Williams, United States District Court for the Southern District of Illinois, signed a court order authorizing the collection of precision location information (PLI) from a mobile telephone believed to be used by Marcus Thompson. Data from the cellular service provider showed that the mobile telephone used by Marcus Thompson is located in the area of Farmington, Missouri.

Because Marcus Thompson fled on foot, leaving the **SUBJECT VEHICLE**, a trooper with MSHP had the **SUBJECT VEHICLE** towed to the Ste. Genevieve County Sheriff's Office, 5 Basler Drive, Ste. Genevieve, Missouri. The **SUBJECT VEHICLE** has been secured in a gated and monitored facility on the Ste. Genevieve County Sheriff's Office property since August 9, 2015.

On or about August 11, 2015, a detective with the Ste. Genevieve County Sheriff's forwarded your affiant photographs taken of the **SUBJECT VEHICLE**. Your affiant, reviewed the images of the truck driven by the defendant Marcus Thompson, and depicted in Attachment A and compared them to the Backpage.com photographs of the **SUBJECT VEHICLE**. MJ reviewed Backpages.com advertisements depicting a truck with a young female in the bed and the extended cab of the truck. She indicated the image was of her and that was Marcus Thompson's truck. Your affiant made a side-by-side comparison between the images of the two vehicles and noted that they have identical rust patterns, identical dents and identical truck bed damage and

based upon that review, your affiant believes that the vehicle driven by Marcus Thompson is the same vehicle displayed in the photographs posted on numerous Backpage ads of M.J. and others, which were posted between on June 17, 2015 and July 4, 2015. A portion of the provided photographs is attached herein as ATTACHMENT A.

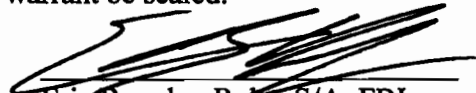
Based on my training and experience, your affiant knows that when an individual occupies a vehicle or places tangible items into a vehicle, certain trace, fingerprint, DNA, and other physical evidence can be left behind. This evidence includes, but is not limited to: latent fingerprints, body fluids, cellular material, hairs, fibers, and other physical evidence, to include those items containing the aforementioned evidence, which relate to, or help establish the identity of the individual or individuals occupying the vehicle.

CONCLUSION

Based on the above information, there is probable cause to believe that 18 U.S.C. §§ 1594(c), 2422 and 2423(a) which criminalize, among other things, sex trafficking of a child and force, fraud, or coercion, coercion and enticement of a person to participate in prostitution and transportation of minor to engage in criminal sexual activity, have been violated, and that the property, evidence, fruits and instrumentalities of these offenses, more fully described in Attachment A of this Affidavit, are located within the Ste. Genevieve County Sheriff's Office, 5 Basler Drive, Ste. Genevieve, Missouri.

Your Affiant requests authority to seize such material, specifically, that the Court issue a search warrant for the property located at Ste. Genevieve County Sheriff's Office, 5 Basler Drive, Ste. Genevieve, Missouri, for the items listed in Attachment B.

In order to prevent the compromise of this on-going investigation, affiant respectfully requests that the application, affidavit and search warrant be sealed.



Eric Brandon Ruhe, S/A, FBI

Summary regarding Attestation via Reliable Electronic Means Pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A)

After being placed under oath and during a video-conference with the undersigned on August 12, 2015, Agent Eric Brandon Ruhe attested to and affirmed the contents of the attached Application for Search Warrant and this Affidavit. He also attested to and affirmed the fact that he is the person who signed said Application and Affidavit, which were submitted to the undersigned via reliable electronic means prior to the video-conference. The video-conference was commenced by the Eastern District of Missouri Clerk's Office staff situated in the federal courthouses in Cape Girardeau, Missouri and St. Louis, Missouri. Agent Ruhe participated from the ninth floor conference room at the Eagleton Courthouse in St. Louis and the undersigned participated from the fourth floor Chambers conference room located in the Limbaugh Courthouse

in Cape Girardeau.

Abbie Crites-Leoni

Abbie Crites-Leoni
United States Magistrate Judge

ATTACHMENT A
Photographs of SUBJECT PREMISE





ATTACHMENT B
Description of Property to be Seized

- 1) Documentation relating to the ownership and/or control of the vehicle, to include, but not limited to: vehicle registration papers, vehicle titles, proof of insurance, credit card receipts, and receipts relating to the sale and maintenance of the vehicle;
- 2) Documentation which can indicate the whereabouts of the vehicle and/or its occupants on certain dates and times, to include, but not limited to: gas and other sales receipts, toll receipts, hotel receipts, parking receipts, parking tickets, and traffic tickets;
- 3) Certain trace, fingerprint, DNA, and other physical evidence, to include, but not limited to: latent fingerprints, body fluids, cellular material, hairs, fibers, and other physical evidence, to include those items containing the aforementioned evidence, which relate to, or help establish the identity of the individual or individuals occupying the vehicle;
- 4) Any evidence of the transportation of minor female children or adult women inside the vehicle, to include, but not limited to clothing, victims' identification, victims' personal property, firearms, ammunition, and cellular telephones.
- 5) Any and all U.S. currency directly or indirectly related to prostitution.
- 6) Any and all records, documents, or materials evidencing physical evidence of prostitution, including but not limited to condoms, condom wrappers, lubricants, contraceptives, antibiotics, anti-inflammatory medications, baby wipes, lingerie, stilettos or high heels, and birth control pills.

- 7) **Any and all records, documents, or materials evidencing the recruiting of, employment of or use of women in prostitution in the SUBJECT VEHICLE or other locations, including, but not limited to books, business records, receipts, notes, ledgers, journals, memoranda, photographs, and/or video cassettes, address and/or telephone books, answering machine recordings, video security camera system, papers, tickets, notes, playing cards, marbles, telephone diaries, message pads, handwritten notes; appointment books; planners, calendars, correspondence between employees and managers or other owners of SUBJECT VEHICLE as described in the Affidavit, and schedules.**